

# **WISCONSIN LEGISLATIVE COUNCIL STAFF**

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 00-125**

### **Comments**

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

#### **1. Statutory Authority**

In the rule analysis prepared by the agency, there is no direct mention of the repeal and recreation of current s. Chir 4.03 defining the practice of chiropractic. It appears that the intent of the agency is to reorganize the section only to allow the addition of the provisions relating to providing “information and counseling regarding the restoration and preservation of health.” However, to avoid misunderstanding regarding the changes to the scope of practice, it would be helpful if the agency would state in the analysis that the reorganization of the current rule is not intended to expand or contract the scope of practice for chiropractors. Further, the analysis should be revised to clearly indicate that additional language is incorporated into the practice section. As currently written, the analysis improperly leads to a conclusion that the only change is in language relating to the use of vitamins and other food and nutritional supplements.

#### **2. Form, Style and Placement in Administrative Code**

The reference in the note following s. Chir 4.05 (1) (d) to “subparagraph” should be changed to “subdivision” to refer to s. Chir 4.05 (1) (d) 1., or to “paragraph” to refer to s. Chir 4.05 (1) (d).